

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE, **RECEIVED**  
WESTERN DIVISION

JUN 25 2025

THE CITY OF MEMPHIS and CHIEF )  
CERELYN J. DAVIS, )  
  )  
Movants.

Wendy R Oliver, Clerk  
U.S. District Court  
W.D. OF TN, Memphis

UNITED STATES OF AMERICA, )  
Plaintiff, )  
  )  
v. )                                  CASE NO. 2:23-cr-20191-SHL  
  )  
EMMITT MARTIN, III, et al., )  
  )  
Defendants. )

**THE CITY OF MEMPHIS'S AND CHIEF C.J. DAVIS'S MOTION TO INTERVENE  
AND PERMIT ACCESS TO SEALED DOCUMENTS**

Non-party Movants, the City of Memphis (the “City”) and Chief Cerelyn J. Davis (“Chief Davis”) (collectively, the “City Movants”), hereby move to intervene in *United States of America v. Martin, III et al.*, Case No. 2:23-cr-20191-SHL (W.D. Tenn.) (the “Criminal Matter”) for access to certain materials that presently appear on the Criminal Matter docket as sealed or inaccessible, including docket entries 840, 844, 845, 846, 847, 848, 849, 852, 861, 863, 869, 872, 875, 879, 880, 883, 884, and any related future filings (hereinafter, collectively referred to as the “Sealed Filings”). In support of the Motion, the City Movants rely on their accompanying Memorandum of Law filed contemporaneously herewith.

Respectfully submitted,

**BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.**

*/s/ Bruce McMullen*

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*Attorneys for Movants, the City of Memphis  
and Chief Cerelyn Davis*

**CERTIFICATE OF CONSULTATION**

I, Bruce McMullen, certify that co-counsel Jennie Silk consulted with counsel for all the parties in this action via email on June 25, 2025. David Pritchard, on behalf of the Government, responded on June 25, 2025, that the Government takes no position on this Motion and would submit the request to the Court's discretion. Also on June 25, 2025, Martin Zummach responded on behalf of Justin Smith that he consents to the intervention. As of the time of this filing, Counsel for Tadarrius Bean and Demetrius Haley had not responded to the consultation outreach.

*s/ Bruce McMullen*

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Bruce McMullen

**CERTIFICATE OF SERVICE**

I, Bruce McMullen, hereby certify that on June 25, 2025, I served a copy of the foregoing upon all counsel of record in this action via email.

*s/ Bruce McMullen*

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Bruce McMullen